

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

LARRY HOPE,

Plaintiff,

vs.

MARK PELZER, et al.,

Defendants.

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Case #

2:96-cv-02968-KOB

PLAINTIFF'S LIST OF DAMAGES

COMES NOW the plaintiff Larry Hope, by and through counsel, in accordance with the Pretrial Order entered herein on September 28, 2005, and provides the following list of damages:

Plaintiff seeks compensatory and punitive damages for injuries suffered May 11, 1995, and June 7, 1995, to be measured by the discretion of the jury.

Hope seeks compensatory damages for pain and suffering and humiliation. They are calculated by asking the jury to place an estimated dollar value on the injuries and pain to which Hope was subjected. An estimated amount of compensatory damages which might be awarded by a jury is approximately \$20,000. Hope seeks punitive damages for malice and willful disregard of his federal rights. The defendant's misconduct was reprehensible to a serious degree, so as to warrant the imposition of further sanctions to achieve punishment or deterrence. The amount of punitive damages will be calculated by the jury based upon the jury's evaluation of the amount sufficient to deter and punish. A ratio of 4:1 between the punitive and compensatory damages would be instructive as indicative of an amount which is reasonable and proportionate to the amount of harm.

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CERTIFICATE OF SERVICE

I hereby certify that on this, the 25th day of October, 2005, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following counsel of record:

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